



PRIVACY NOTICE

Last modified: 23/07/19

Under this Privacy Notice, we, Essilor Ltd, inform you what personal data of yours we collect, why we collect it, and what we do with it. Your personal data means any information relating to you, including your name and contact details.

Please take the time to read this Privacy Notice carefully, it is very important that you fully understand how we are processing your personal data and how we are protecting your privacy. If you have any question regarding our use of your personal data, you can of course contact us as set out below:

Our contact details are: **Essilor Ltd, Cooper Road, Thornbury, BS35 3UW.**

Our Data Protection Officer is: dp-request@essilor.co.uk.

WHAT PERSONAL DATA WE COLLECT

Data we collect when you visit our website

When you access our website, we automatically collect and store some of your data in our server logs and in cookies, which are small files we send to your computer when you visit our website.

This data does not allow us to identify you directly. However, we do record data related to your browsing on our website, such as the pages that you accessed, the date and time you accessed these pages, your search queries, information on your device (hardware model, operating system version, unique device identifier, Internet protocol address, hardware settings, browser type, browser language), the date and time of your request and referral URL.

The provision of your personal data is not required if you only want to visit our website. This means that you may refuse to accept cookies by configuring your web browser accordingly (for more information, refer to the 'help' section of your web browser). However, refusing cookies is likely to disrupt your navigation on our website, in particular by preventing you from accessing certain parts of it.

Data we collect when you sign up, ask a question, register your product or send a request

Some of the services offered on our website require you to sign up. If you want to use these services, we will ask you to provide us with personal data. Please provide us with complete and accurate data, and also inform us if your data needs to be updated. If you do not provide us with complete and accurate data, or if you do not inform us that your data needs to be updated, we may not be able to provide you with the services you requested.

We collect the following categories of your personal data:

- **Identification data** - Contact name, email address, phone number, voucher code number, Essilor order number, product purchased and optician practice you book with.
- **Location data** – We use your IP address, or location entered on our store locator, to localise you.

- **IT data** including data related to your browsing on our website, such as the pages that you accessed, the date and time you accessed these pages, your search queries, information on your device (hardware model, operating system version, unique device identifiers, Internet protocol address, hardware settings, browser type, browser language), the date and time of your request and referral URL.

HOW WE USE PERSONAL DATA WE COLLECT

We only use your personal data within the limits authorized by the laws and regulations. Sometimes, we shall use your personal data because the laws and regulations require us to do so. In any case, we do not make any automated decisions solely on automatic processing which may produce legal effects concerning you, or similarly significantly affect you.

We use your personal data for the following purposes:

- We use your appointment and order details to send personalised email communications and personalised website banners. Such a process is allowed by Art 6 para. 1 lit B of Regulation (EU) 2016/679 (General Data Protection Regulation): processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- We use your IT data to check the performance of our website and user experience. Such a process is allowed by Art 5 para.1 lit E of Regulation (EU) 2016/679 (General Data Protection Regulation): kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject (‘storage limitation’);

HOW LONG WE KEEP PERSONAL DATA WE COLLECT

The period for which we store your personal data is shown in the table below:

Category of data	Retention period
Contact details	3 years from the collection of the data
Order details	7 years from the collection of the data
Google Analytics	26 months from the collection of data

Each order is kept 7 years in our system for legal purpose. Once an order is deleted, all personal data associated to the order is therefore deleted.

PERSONAL DATA WE SHARE

We inform you that we share your personal data with companies outside of Essilor International.

Category of data	Category of recipients	Location
Contact data: Name, email address, phone number, Essilor order number and optician practice	CRM	salesforce.com EMEA Limited - Europe
Contact data: Name, email address, phone number, Essilor order number and optician practice	CRM	Salesforce Marketing Cloud - Europe

For recipients located in United States, the European Commission has adopted on July 12, 2016 a Decision (the “adequacy decision”) in which it found that the E.U.-U.S. Privacy Shield ensures an adequate level of protection for personal data that has been transferred from the EU to organisations in the US. The US has decided that this country ensures an adequate level of protection by reason of its domestic law or of the international commitments it has entered to. This framework protects the fundamental rights of anyone in the EU whose personal data is transferred to the US for commercial purposes.

HOW WE PROTECT PERSONAL DATA

We have measures in place to protect your personal data against unauthorized access, use, or disclosure, including without limitation:

- We implement and maintain sophisticated technical measures to ensure that your personal data is recorded and processed in complete confidentiality and security.
- We implement and maintain appropriate restrictions on access to your personal data, and monitoring of the access, use, and transfer of personal data.
- All of our employees who have access to your personal data are required to enter into non-disclosure or similar agreements, which impose obligations on them to comply with our data privacy and confidentiality requirements.
- We require any business partners and third party service providers with whom we may share your personal data to comply with any applicable data privacy and confidentiality requirements.
- We provide data privacy training on a regular basis to our employees and third parties who have access to personal data.

WHAT RIGHTS YOU HAVE

Under applicable data protection laws and regulations, you have right:

- Of access to, rectification of, and/or erasure of your personal data;
- To restrict or object to its processing;
- To tell us that you do not wish to receive marketing information;
- In some circumstances, to require certain of your personal data to be transferred to you or a third party
- To the extent our processing of your personal data is based upon your consent, to withdraw your consent, without affecting the lawfulness of our processing based on your consent before its withdrawal.

We are committed to enable you exercising your rights: to do so, you can contact us here consumer@essilor.co.uk. Please provide us with the following information, so that you can take your request with all due consideration:

- Your name and surname, and a photocopy of your identity card;
- Your specific petition (in other words, what rights you want to exercise); and
- The date of the application.

If you do not get satisfaction by contacting us, you can also lodge a complaint about our processing of your Personal Data with a data protection authority.

CHANGES TO THIS PRIVACY NOTICE

We regularly review our compliance with our Privacy Notice, in particular to make it compliant with new laws and regulations regarding data protection. But, even if this Privacy Notice may change from time to time, we will not reduce your rights under this Privacy Notice without your explicit consent.